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November 8, 2005

Stuart A. Levy, Under Secretary
Office of Terrorism and Financial Intelligence
U.S. Department of the Treasury
1500 Pennsylvania Ave., NW
Washington, D.C. 20220

Alan L. Beller, Director
Division of Corporate Finance
U.S. Securities and Exchange Commission
450 Fifth Street
Washington, D.C. 20549

Dear Gentlemen,

I am writing to you on behalf of the California Public Employees' Retirement System (CalPERS). On June 3, 2005, CalPERS joined other public pension funds in the United States and wrote to you along with the U.S. Department of State and the U.S. Department of Commerce requesting your assistance in identifying any publicly traded companies that are of concern to the United States government for doing business with, or having business ties to, entities that support terrorism or threaten U.S. humanitarian goals (Attachment 1). We identified the situation in Sudan to illustrate the importance of our request.

To date, we have not received a response from the U.S. Department of the Treasury or the U.S. Securities and Exchange Commission. Therefore, the CalPERS Board of Administration directed me at its Investment Committee meeting on September 19, 2005 to follow-up with you regarding your efforts on this issue.

As a long-term investor, CalPERS is concerned that not only has it been suggested that companies that do business in Sudan may thereby be furthering or condoning the egregious human rights violations currently occurring in that country, but also that any company associated with the atrocities taking place in Sudan poses a serious risk to creating sustainable and responsible long-term value. CalPERS is attempting to monitor and manage any such risk.

However, we believe that the United States government is the only appropriate entity to identify a comprehensive list of companies that do business in Sudan. The United States government is the one credible centralized source with the capability of understanding national security and human rights implications of company operations and of directing appropriate prohibitions and sanctions against these companies. Because no

comprehensive list currently exists, we requested in the letter dated June 3, 2005 that your agency, working in conjunction with other appropriate federal agencies and departments, publicly disclose the identity of companies that, by virtue of their business ties in terrorist sponsoring countries, are acting contrary to U.S. foreign policy and humanitarian interests, and that you report other information on such companies that will enhance investors' capability to make prudent investment decisions.

We are requesting a timely response from you concerning our request. Please send your written response to:

Dennis A. Johnson, CFA
Senior Portfolio Manager
CalPERS, Investment Office
400 Q Street
Sacramento, CA 95814

Please do not hesitate to contact me if you have any questions. I may be reached at (916) 795-2731.

Sincerely,

Dennis A. Johnson, CFA
Senior Portfolio Manager

Enclosure

cc: Thomas R. Lussier, President
Lussier, Gregor, Vienna & Associations, Inc.

John W. Snow, Secretary
U.S. Department of the Treasury

Robert W. Werner, Director
Office of Foreign Assets Control
U.S. Department of the Treasury

William H. Donaldson, Chairman
U.S. Securities and Exchange Commission

Cecelia D. Blye, Director
Office of Global Security Risk
U.S. Securities and Exchange Commission

Charles Fishkin, Director
Office of Risk Assessment
U.S. Securities and Exchange Commission